

IN THE CIRCUIT COURT OF EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR SEMINOLE COUNTY, FLORIDA

THE HEALTHLAWFIRM,
GEORGE INDEST

Case No.: 13-CA-3790-15-K

v.

NEELAM UPPAL

_____ /

3-2
9/26/14

OBJECTION TO PLAINTIFF's MOTION FOR SUMMARY JUDGEMENT

COMES NOW, NEELAM UPPAL, M.D., Defendant, Files Objection to the Motion FOR Summary judgement filed by Mr. George Indest and notices the court about related cases objecting motion to dismiss for 'Lack of Jurisdiction' and states grounds as follows:

- 1. Defendant,** Objects to motion foSummary Judgement filed by plaintiff constitutes Perjury under Florida Statutes
2. The Plaintiff knew about Bankruptcy and that it was dismissed because the debt limit was above the Chaper 13 as Per USC 11.
3. Defendant's home i n Pinellas park is not vacant. See attached utility Bill.
4. Mr. Indest is conspiring with other other adversarial attorney. His Conspiracy confirms that the Jurisdiction is Pinellas County. See attached NOTICE OF RELATED CASES.
5. Mr. Indest has filed ~~fraudulent~~ bills and caused severe harm to the Debtor, blocked the business of the Defendant's , interfered with It. He filed liens and foreclosure.



6. Mr. George Indests' action constitutes Unethical Practice of Law under Florida Bar rule 4.1, and for excessive billing.

7. Mr. George Indests and the HealthLaw firms' actions constitute Malpractice for failing to release the defendant's records and holding them as hostage such that the defendant needed her evidentiary documents in possession of Mr. Indest.

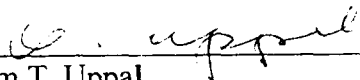
6. Defendant contends that this court lacks Jurisdiction, the plaintiff confirms this in his motion by presenting his conspiracy with another ongoing case in Pinellas County.

WHEREFORE, Defendant respectfully requests this Court to dismiss this matter for lack of Jurisdiction Pursuant to Florida Statute 47.011 and 47.021 and granting such other and further relief as to this Court is deemed proper and just.

DECLARATION

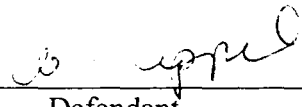
The undersigned Defendant states that the statements and figures contained herein are true and correct to the best of her knowledge, information and belief.

Date: 9/22/14



Neelam T. Uppal

Respectfully submitted on this 22-day of Sept, 2014.



Defendant

NEELAM UPPAL, Pro se.

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